

FILED

Dec 15 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

SEALED BY ORDER OF THE COURT

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Acting Under Authority Conferred By 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 18-CR-00258 EJD
)	
Plaintiff,)	DECLARATION OF VANESSA BAEHR-JONES
)	IN SUPPORT OF UNITED STATES' OMNIBUS
v.)	REPLY
)	
ELIZABETH HOLMES and RAMESH)	<u>[FILED PROVISIONALLY UNDER SEAL</u>
"SUNNY" BALWANI,)	<u>PURSUANT TO COURT ORDER OF JANUARY</u>
)	<u>13, 2020]</u>
Defendants.)	

I, Vanessa Baehr-Jones, declare:

1. I am an Assistant United States Attorney (AUSA) representing the United States of America, the plaintiff in this case.

2. Attached hereto as Exhibit 1 is a true and correct copy of a Federal Bureau of Investigation (FBI) 302 report of interview for Paige Williams.

3. Attached hereto as Exhibit 2 is a true and correct copy of an FBI 302 report of interview for Nicole Canas.

1 4. Attached hereto as Exhibit 3 is a true and correct copy of a video clip, dated July 15,
2 2015, depicting Defendants Elizabeth Holmes and Ramesh Balwani at a Theranos event.

3 5. Attached hereto as Exhibit 4 is a true and correct copy of a video clip, dated July 15,
4 2015, depicting Holmes and Balwani at a Theranos event.

5 6. Attached hereto as Exhibit 5 is a true and correct copy of a video clip, dated April 7,
6 2015, depicting Holmes and Balwani at a Theranos event.

7 7. Attached hereto as Exhibit 6 is a true and correct copy of a video clip, dated April 7,
8 2015, depicting Holmes and Balwani at a Theranos event.

9 8. Attached hereto as Exhibit 7 is a true and correct copy of a video clip, dated April 7,
10 2015, depicting Holmes and Balwani at a Theranos event.

11 9. Attached hereto as Exhibit 8 is a true and correct copy of a video clip, dated April 7,
12 2015, depicting Holmes and Balwani at a Theranos event.

13 10. Attached hereto as Exhibit 9 is a true and correct copy of a video clip, dated April 7,
14 2015, depicting Holmes and Balwani at a Theranos event.

15 11. Attached hereto as Exhibit 10 is a true and correct copy of a video clip, dated April 7,
16 2015, depicting Holmes and Balwani at a Theranos event.

17 12. Attached hereto as Exhibit 11 is a true and correct copy of a video clip, dated April 7,
18 2015, depicting Holmes and Balwani at a Theranos event.

19 13. Attached hereto as Exhibit 12 is a true and correct copy of a video clip, dated April 7,
20 2015, depicting Holmes and Balwani at a Theranos event.

21 14. I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct and that this declaration is executed at Oakland, California, on December
23 11, 2020.

24 DATED: December 11, 2020

25 
26 VANESSA BAEHR-JONES
27 Assistant United States Attorney
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